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Attorneys for Defendants

UNITEDHEALTHCARE INSURANCE COMPANY and UHC OF CALIFORNIA

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

SAN JOAQUIN GENERAL HOSPITAL, a  
department of the County of San Joaquin, a  
political subdivision of the State of California,

Plaintiff,

v.

UNITEDHEALTHCARE INSURANCE  
COMPANY, a Connecticut for-profit  
corporation; UHC OF CALIFORNIA, a  
California corporation; and DOES 1  
THROUGH 25, INCLUSIVE,

Defendants.

Case No.: 2:22-cv-00862-TLN-DB

[Hon. Troy L. Nunley, presiding]

**STIPULATION AND REQUEST TO  
CONTINUE PRETRIAL SCHEDULE  
ORDER; ORDER**

Trial Date: None set yet

**TO THE HONORABLE COURT, ALL PARTIES AND THEIR ATTORNEYS OF  
RECORD:**

This Joint Stipulation is made by plaintiff, SAN JOAQUIN GENERAL HOSPITAL (“Plaintiff”) and defendant UNITEDHEALTHCARE INSURANCE COMPANY, and defendant UHC OF CALIFORNIA, INC. (collectively the “Defendants”), hereby submit, through their undersigned counsel of record, this STIPULATION AND REQUEST TO CONTINUE PRETRIAL SCHEDULE ORDER for a short continuance to accommodate the Parties’ ongoing resolution efforts.

*WHEREAS*, on May 20, 2022, Plaintiff filed its complaint involving eleven separate medical claims, mostly trauma services;

*WHEREAS*, on May 20, 2022, the Court issued an Initial Pretrial Schedule Order;

*WHEREAS*, on June 23, 2022, the Parties stipulated to extend time for Defendants respond to the complaint;

*WHEREAS*, on July 22, 2022, Defendants filed their answer to the complaint;

*WHEREAS*, the Parties have engaged in meet and confer process with respect to various alternative dispute resolution options to resolve this matter; however, because the majority of the claims involved trauma services, it has required additional time to review and evaluate them;

*WHEREAS*, the Parties are continuing with discovery and coordinating depositions dates;

*WHEREAS*, the Parties are continuing their efforts to engage in settlement discussions in advance of having to commit additional resources to related to trial;

*WHEREAS*, because Plaintiff is a governmental entity, thus any settlement requires the Board of Supervisors’ approval, which necessitates additional time;

*WHEREAS*, the Parties agree that additional time is needed to allow the parties to thoroughly research the claims and in good faith discuss a resolution of this matter. Thus, a short

continuanance of the following pretrial schedule order is necessary to accommodate the above efforts.

WHEREAS, this is the Parties' first request to continue the pretrial scheduling order;

NOW THEREFORE, **THE PARTIES HEREBY STIPULATE AND JOINTLY REQUEST** that the court enter an order continuing the pretrial schedule order as follows:

	Original	Proposed new date
Close of discovery	3/17/2023	7/17/2023
Expert Designation plus Written Report Due	5/16/2023	9/18/2023
Supplemental expert designation Due	6/15/2023	10/16/2023
Last day to file dispositive motion	9/13/2023	1/15/2024
Joint Notice of Trial Readiness Due	7/14/2023	11/14/2023

**IT IS SO STIPULATED.**

Dated: 3-1-2023

LAW OFFICES OF STEPHENSON, ACQUISTO & COLMAN, INC.

*/s/ Barbara V. Lam*

By: \_\_\_\_\_

Barbara V. Lam  
Attorney for Plaintiff  
SAN JOAQUIN GENERAL HOSPITAL

Dated: 3-1-2023

WALRAVEN & WESTERFELD LLP

*/s/ Jessica B. Hardy*

By: \_\_\_\_\_

Jessica B. Hardy  
Attorneys for Defendants  
UNITEDHEALTHCARE INSURANCE COMPANY  
and UHC OF CALIFORNIA

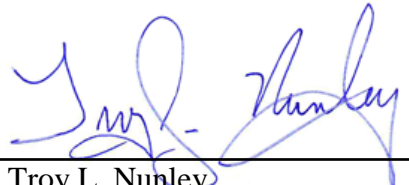
*Filer's Attestation: I, Barbara V. Lam, hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.*

**ORDER**

Based on the STIPULATION AND REQUEST TO CONTINUE PRETRIAL SCHEDULE ORDER, and good cause appearing, **IT IS HEREBY ORDERED** that the pretrial trial schedule will be continued as follows:

	Original	New Dates
Close of discovery	3/17/2023	7/17/2023
Expert Designation plus Written Report Due	5/16/2023	9/18/2023
Supplemental expert designation Due	6/15/2023	10/16/2023
Last day to file dispositive motion	9/13/2023	1/16/2024
Joint Notice of Trial Readiness Due	7/14/2023	11/14/2023

DATED: March 2, 2023

  
Troy L. Nunley  
United States District Judge